

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE SANBORN LIBRARY LLC,

Plaintiff and Counterclaim-  
Defendant, and

ENVIRONMENTAL DATA RESOURCES, LLC,

Counterclaim-Defendant,

v.

ERIS INFORMATION INC., ERIS INFORMATION  
LIMITED PARTNERSHIP, and ECO LOG  
ENVIRONMENTAL RISK INFORMATION SERVICES  
LTD.,

Defendants and Counterclaim  
Plaintiffs.

No. 1:19-cv-02049-JHR-OTW

**HIGHLY CONFIDENTIAL- OUTSIDE  
COUNSEL'S EYES ONLY**

**REPLY MEMORANDUM OF LAW IN SUPPORT OF ERIS'**  
**MOTION FOR SUMMARY JUDGMENT AND IN OPPOSITION TO THE**  
**SANBORN LIBRARY, LLC'S CROSS-MOTION FOR SUMMARY JUDGMENT**

**PROVISIONALLY FILED  
ON FLASH DRIVE AND  
UNDER SEAL PURSUANT  
TO ECF NO. 275**